

## **REMARKS**

Claim 30 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicant has canceled claim 30, without prejudice.

Claims 1, 2, 3, 7-8, 24, and 26-28 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Rostoker '214. Applicant respectfully traverses the rejection.

Regarding independent claim 1 and dependent claims 2-3, 7-8, and 24, Applicant respectfully submits that Rostoker '214 neither teaches nor suggests at least a plurality of interconnects including a plurality of Y's, where each of the Y's respectively connect to the cells in clusters of three cells each. As provided in the present application (e.g., page 11, lines 14-16) a Y is a structural routing model in which interconnects or legs extend in three separate directions from a common node. Further, claim 1 defines that each of the Y's respectively connect the cells in clusters of three cells each.

The Office Action cites Figure 75 of Rostoker '214 for teaching the claimed plurality of Y's, but no combination of the various interconnects shown in Figure 75 provides a structural routing model that includes interconnects extending in three separate directions from a common node, and that connects the cells in clusters of three cells each. To the extent the Office Action's rejection relies on the three interconnects labeled 2098, 2100 and 2102 in Fig. 75, Applicant respectfully submits that these interconnects connect the hexagonal cells 2094 in a cluster of four cells, not three.

For at least these reasons, Applicant respectfully submits that claims 1, 2, 3, 7-8, and 24 are allowable over the references of record, including Rostoker '214. Applicant thus requests reconsideration and withdrawal of the rejection.

Independent claim 26 and dependent claims 27-28 are believed to be allowable for similar reasons as for claim 1, and for at least the additional reason that Rostoker '214 fails to teach or suggest Y's connecting hexagonal cells in clusters of three adjacent cells each. Figure 75 of Rostoker '214, cited for this claimed feature, fails to teach interconnects providing a Y that connects hexagonal cells 2094 in clusters of three adjacent cells each. For example, while interconnects 2100 and 2102 in Fig. 75 connect cells in a cluster of three adjacent cells, these two interconnects do not provide a Y. The same is true for interconnects 2098 and 2100.

Additionally, with respect to dependent claim 3, though Rostoker '214 appears to disclose that an array can be multilevel, it does not teach or suggest, among other things, that nodes of Y's connecting clusters of a lower level are interconnected by Y's of a higher level. There is no teaching in Rostoker '214 of a higher level Y that is cited in the Office Action. Similarly, Applicant submits that dependent claim 28 is separately allowable over Rostoker '214 for at least these additional reasons.

Claims 5 and 6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rostoker '214 in view of Terasawa. Applicant respectfully traverses the rejection for at least the reasons stated above regarding independent claim 1, and for at least the additional

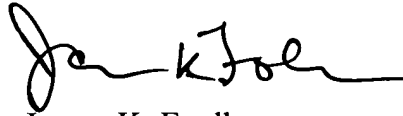
reason that Terasawa does not appear to remedy the deficiencies of Rostoker '214 regarding the claims (for example, see Figures 1-4 of Terasawa, which do not show interconnects).

Claim 25 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Rostoker '214. Applicant respectfully traverses the rejection for at least the reasons stated above regarding independent claim 1 and for at least the additional reason that Rostoker '214 appears to teach away from the additional feature in claim 25 that the hexagonal flow congestion pattern does not include the center of the hexagonal pattern (e.g., see Fig. 75).

The Examiner has indicated that claims 4, 19, and 29 would be allowable if rewritten in independent form. Applicant acknowledges and appreciates this statement. At the present time, Applicant elects to keep the claims in their present form pending the Examiner's reply to the remarks submitted herewith.

For at least the above reasons, Applicant respectfully submits that the case is in condition for allowance, which is respectfully requested. The Examiner is invited to contact Applicant's attorney if an interview would expedite prosecution.

Respectfully submitted,  
GREER, BURNS & CRAIN, LTD.

By:   
James K. Foelker  
Registration No. 37,538

Customer No. 24978  
June 16, 2008  
300 South Wacker Drive  
Suite 2500  
Chicago, Illinois 60606  
Telephone: (312) 360-0080  
Facsimile: (312) 360-9315